## **Seattle City Light**

Jorge Carrasco, Superintendent

December 17, 2004

Ken Koch Department of Ecology Water Quality Program P.O. Box 47600 Olympia, WA 98504-7600

Re: Seattle City Light comments on Washington State Department of Ecology's Final Draft Water Quality Assessment and 303(d) List for 2002-2004

Dear Mr. Koch:

Thank you for this second opportunity to comment on the final draft of the 2002-2004 water quality assessment and 303(d) list assembled by Ecology staff. We note that four (4) additional listings for total dissolved gas and four additional (4) listings for temperature have been added to the List for the Pend Oreille River, within the river "segment" associated with our Boundary Hydroelectric Project. Our review yields one comment for your consideration.

## "De-listing" Process

The temperature TMDL process may conclude that higher temperatures in the summer months (in excess of 20°C) are a "natural condition" of this water body and are not due to a human activity. In the event of such an outcome, what is the process by which a water body would become "delisted" and what would need to be done and by whom? Our understanding now is that the TMDL conclusions would provide the necessary documentation to "de-list" the water body, and during the next round of statewide water quality assessments, Ecology would actually remove the water body from the 303(d) list. Please clarify the process to "de-list" a water body and what would need to be done, by whom.

Thank you again for this opportunity to comment on your 2002-2004 water quality assessment for the State of Washington. If you have any questions about our comment, please call Barbara Greene at (206) 615-1091.

Sincerely,

Nancy Glaser, Director Environment & Safety Division

HCP:sd

